

Aaron L. Hammer
Nathan E. Delman
HORWOOD MARCUS & BERK CHTD.
500 W. Madison St., Ste. 3700
Chicago, IL 60661
312-606-3200
ahammer@hmblaw.com
ndelman@hmblaw.com

Attorneys for Kelleher Place Management, LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

VOYAGER DIGITAL HOLDINGS, INC. *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 22-10943 (MEW)
)

) (Jointly Administered)
)

**AMENDED NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF ALL
PLEADINGS**

PLEASE TAKE NOTICE that Horwood Marcus & Berk Chartered appears as counsel for **Kelleher Place Management, LLC** in the above-captioned chapter 11 cases pursuant to Rules 2002, 3017(a), 9007, 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and requests that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, and orders, or other documents, filed or entered in these cases, be transmitted to:

¹ The Debtors in these chapter 11 cases are: Voyager Digital Holdings, Inc.; Voyager Digital Ltd.; and Voyager Digital, LLC. The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

**HORWOOD MARCUS & BERK
CHARTERED**

Aaron L. Hammer
Nathan E. Delman
500 W. Madison St., Ste. 3700
Chicago, IL 60661
Telephone: 312-606-3200
Fax: 312-606-3232
Email: ahammer@hmblaw.com;
ndelman@hmblaw.com;
ecfnotices@hmblaw.com

PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Bankruptcy Rules and title 11 of the United States Code, but also includes orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, electronically, or otherwise filed with regard to the above case.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any prior or later appearance, pleading, claim, or suit shall waive any right of Kelleher Place Management, LLC to (a) have final orders in non-core matters entered only after de novo review by a District Court judge, (b) trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (c) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (d) any other rights, claims, actions, defenses, setoffs or recoupments, under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: July 15, 2022

HORWOOD MARCUS & BERK CHARTERED

By: /s/ Aaron L. Hammer

Aaron L. Hammer (N.Y. Bar # 4759080)

Nathan E. Delman

500 W. Madison St., Ste. 3700

Chicago, Illinois 60661

Ph: 312-606-3200

Fax: 312-606-3232

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